Appl No.: 09/750,831 Atty. Dkt. FLG-28US

## **REMARKS/ARGUMENTS**

Favorable consideration of this application is respectfully requested. Applicant has rewritten claims 1 and 21 and added new claims 30-32. Favorable reconsideration of this application is, consequently, earnestly solicited in view of the following remarks. Applicant gratefully appreciates the examiner's indication that claims 22-24 would be allowable if put into independent form. Applicant again directs the examiner's attention to the fact that claim 22 is an INDEPENDENT CLAIM and not a dependent claim. Applicant appreciates the examiner's indication that claim 10, and 26-29 would be allowable if put into independent form.

Applicant notes that independent claim 1 has been amended to include the indicated allowable subject matter of former dependent claim 26.

Independent claim 21 has been amended to include the indicated allowable subject matter of former dependent claim 28.

New independent claim 30 is a combination of previously presented independent claim 1 and the indicated allowable subject matter of former dependent claim 10.

New independent claim 31 is a combination of previously presented independent claim 1 and the indicated allowable subject matter of former dependent claim 27.

New independent claim 32 is a combination of previously presented independent claim 11 and the indicated allowable subject matter of former dependent claim 29.

Applicant includes with this response a supplemental prior art listing that includes additional art that was recently found by the applicant. Entry of the supplemental prior art statement is respectfully requested.

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Claims 1, 6, 7, 9, 11, 21 and 25 were rejected under sec. 102b as being anticipated by Achen.

Claims 2-3 were rejected under sec. 103 as being unpatentable over Achen, and Claims 4-5 were rejected under sec. 103 as being unpatentable over Achen in view of Hawley.

These rejections are now moot since independent claim 1 has been amended to include the indicated allowable subject matter of former dependent claim 26, and independent claim 21 has been amended to include the indicated allowable subject matter of former dependent claim 28.

Thus, removal of these rejections are respectfully requested.

The remaining references of record cited but not applied to Sharples, Manak, Carman and Ritter, fail to overcome the deficiencies to the cited references described above.

Applicant contends the references cannot be modified to incorporate the features of subject claims 1-7, 10, 21-25 and 30-32 without utilizing Applicant's disclosure. The courts have consistently held that obviousness cannot be established by combining the teachings of the prior art to Applicant to produce the claimed invention, absent some teaching, suggestion, incentive or motivation supporting the combination.

In view of the foregoing considerations, it is respectfully urged that claims 1-7, 10, 21-25 and 30-32 be allowed. Such action is respectfully requested. If the Examiner believes that an interview would be helpful, the Examiner is requested to contact the attorney at the below listed number.

Respectfully Submitted;

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Atty. Dkt. FLG-28US

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